



June 27, 2018

FILED BY COURIER AND ELECTRONICALLY VIA ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

**Re: The Uniendo a Puerto Rico Fund and the Connect USVI Fund
WC Docket Nos. 18-143, 10-90 and 14-58**

Dear Ms. Dortch:

Broadband VI, LLC (“Broadband VI”) respectfully submits the attached Certification in response to the Commission’s Order released on May 29, 2018 in the above-referenced proceeding inviting providers of broadband service to participate in Stage 1 of the Connect USVI Fund (the “Stage 1 Order”). Broadband VI applauds the efforts of the Commission to establish a funding mechanism to aid in the restoration and protection of Internet services on the U.S. Virgin Islands, and welcomes the opportunity to participate in this important endeavor.

Broadband VI began operations in 2004, and today is one of the leading providers of fixed broadband services on the U.S. Virgin Islands. Prior to Hurricanes Irma and Maria, Broadband VI provided fixed broadband service to residential and business customers, as reported in Broadband VI’s Form 477 filed on September 1, 2017, as amended. As additional evidence, in written testimony submitted to the U.S. Virgin Islands Public Service Commission (“USVI PSC”) on February 26, 2016, in Docket No. 641, Broadband VI reported that, at that time (some 16 months prior to June 30, 2017), it had “approximately residential and business customers in the Virgin Islands.” It currently serves more than subscribers on all three of the inhabited U.S. Virgin Islands. Broadband VI relies primarily on unlicensed spectrum, which enables it to deploy quickly in a cost-effective manner to deliver affordable fixed broadband service to the public.

Unfortunately, the devastation wrought by Hurricanes Irma and Maria significantly compromised the ability of Broadband VI to provide its broadband services. By aggressively repairing hurricane damage as soon as it could, including rebuilding nine towers, replacing equipment at each of its tower sites, and rebuilding and re-aligning dishes, and after having spent more than \$2 million of its own money on repairs, Broadband VI fully restored its services. Letters from three Broadband VI customers attesting to the company’s diligent response to the hurricanes are attached to this filing. Yet despite the full restoration of services, Broadband VI

still faces a daunting, and costly, list of needs to improve its services and protect against possible future natural disasters.

Improving services and guarding against future natural disasters will undoubtedly benefit citizens of the U.S. Virgin Islands. Broadband VI plays a vital role in providing broadband communications services to the U.S. Virgin Islands as explained in the attached letters from three of Broadband VI's customers.

Broadband VI recognizes that the Stage 1 Order sets appropriate limits on the use of Stage 1 funding. Consistent with this directive, Broadband VI anticipates that it will use any such funding that it receives for the following purposes: the purchase of approximately 2,500 spare customer radios; the establishment of new inter-island links; the installation of spare dishes and link radios; the expansion of new 5G coverage; and other appropriate uses as described in the Stage 1 Order.

As required by the Stage 1 Order, Broadband VI is willing to be designated an eligible telecommunications carrier ("ETC"), and has already petitioned the USVI PSC for such designation. On June 15, 2018, the USVI PSC unanimously agreed to review ETC applications and to issue subsequent recommendations in order to complete ETC designation within 60 days from the ETC application filing date. Once its ETC designation has been granted, Broadband VI agrees to submit its ETC designation to the Universal Service Administrative Company ("USAC") before receiving any funding. It also agrees to remain an ETC for at least one year after first receiving funding. Broadband VI understands that it is subject to USAC's 2018 audits.

If you have any questions concerning the foregoing request, please contact Broadband VI's legal counsel Stephen Coran at 202-416-6744 or Philip Bonomo at 202-416-6773.

Sincerely,

/s/ Michael Melusky

Michael Meluskey
CTO and Founder
Broadband VI, LLC

Attachments

cc: ConnectAmerica@fcc.gov (by email)

CERTIFICATION

I, Michael Meluskey, in my capacity as Chief Technology Officer and Founder of Broadband VI, LLC ("Broadband VI"), hereby certify under penalty of perjury that the following is true and correct:

As of June 30, 2017, Broadband VI had _____ broadband internet access service subscribers, as that term is defined for purposes of FCC Form 477 reporting. This subscriber total is the same figure reported on Broadband VI's Form 477 filed on September 1, 2017, as amended.

The subscriber figure is supported by the following evidence: In written testimony submitted to the U.S. Virgin Islands Public Service Commission on February 26, 2016 in its Docket No. 641, Broadband VI reported that at that time (some 16 months prior to June 30, 2017), it had "approximately _____ residential and business customers in the Virgin Islands." Broadband VI currently has approximately _____ subscribers.

Executed on June 27, 2018.



Michael Meluskey

ATTACHMENT

CUSTOMER LETTERS



United Corporation d/b/a PLAZA EXTRA EAST

PHONE: (340) 778-6240
FAX: (340) 778-1200
Email Address: plazaextra@yahoo.com

P.O. BOX 763
CHRISTIANSTED, ST. CROIX
U.S. VIRGIN ISLANDS 00821

Hurricane Irma and Hurricane Maria both category 5 hurricanes came through our islands and destroyed everything, our way of living, our schools, our homes, our businesses, etc. After both hurricanes destroyed everything we had no communication with anyone outside the island, even as close as our neighboring islands. Communication of any sort was of high priority, and therefore we needed to get any kind of communication that could have gotten things moving again in order to get some sort of relief.

- Broadband VI became our relief, our main source of communication.
- Broadband VI has helped us in assisting our community to make shopping at Plaza Extra East as smooth as possible.
- Broadband VI has helped us contact our vendors to make our food purchases, so we can keep supplying our islands.
- Broadband VI has also helped with our residence, we were able to get communication at our homes.

Broadband VI was there when we needed them, they were effective, they were responsive in this time of disaster. Broadband VI is a company that we can trust.

Yusuf Yusuf





RR #1 Box 6199 Kingshill,
Virgin Islands 00850-9807

340.779.3331 Fax
www.ghcds.org

March 19th, 2018

To Whom It May Concern:

BroadBand VI has been our E-Rate ISP provider for at least the last ten years and has provided exceptional service. After Hurricane Maria, BroadBand VI worked quickly to restore our internet connection using a microwave backup connection.

Respectfully,

Mark Locher
Assistant Director of Technology
Good Hope Country Day School

March 19, 2018

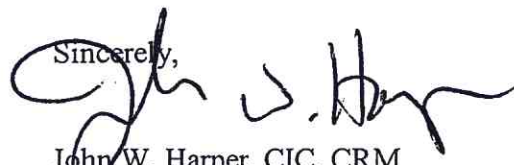
To who it may concern:

Broadband VI has provided broadband internet service to Marshall & Sterling Insurance on St. Croix and Theodore Tunick & Co on St. Thomas and St. John, both by microwave and fiber-optic for many years.

Broadband VI worked very hard to restore service at all of our locations following Hurricanes Irma and Maria. Understanding that our internet service was a critical need for us, we got exceptional service and I was always able to reach someone to talk about our service needs.

I have been very pleased with the service and responsiveness that I have received from Broadband VI.

Sincerely,



John W. Harper, CIC, CRM
President

Marshall & Sterling St. Croix, Inc.

Phone: 340-773-2170 ext 236

Mobile: 340-227-3891

Fax: 340-773-2601